

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

In re:

*Application of the Reporters Committee for
Freedom of the Press for an Order Authorizing
the Release of Grand Jury Material Cited,
Quoted, or Referenced In the Report of Special
Counsel Robert S. Mueller III*

Case: 1:19-mc-00045
Chief Judge Beryl A. Howell

JOINT MOTION TO STAY

Pursuant to the Court’s Minute Order dated April 10, 2019, counsel for the government and the Reporters Committee for Freedom of the Press (the “Reporters Committee”) have conferred and jointly move the Court to extend the stay of the entry of a briefing schedule on the Reporters Committee’s Application for 30 days, subject to requests to renew the stay further, in light of the petition for rehearing en banc filed on May 9, 2019 in *McKeever v. Barr*, No. 17-5149 (D.C. Cir. 2018).

The parties respectfully reserve the right to request that this Court lift the stay at any time and to propose a briefing schedule.

Dated: May 13, 2019

Respectfully submitted,

/s/ Elizabeth J. Shapiro

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[PROPOSED] ORDER

On consideration of the parties' Joint Motion to Stay, it is HEREBY:

ORDERED that the Joint Motion to Stay is GRANTED; and it is further

ORDERED that the entry of a briefing schedule on the Reporters Committee for Freedom of the Press's Application is stayed for 30 days, subject to requests to renew the stay further, in light of the petition for rehearing en banc filed on May 9, 2019 in *McKeever v. Barr*, No. 17-5149 (D.C. Cir. 2018).

SO ORDERED on this ____ day of ____, 20 ____.
